

Mitchell D. Gliner, Esq.  
Nevada Bar 3419  
3017 West Charleston Blvd., #95  
Las Vegas, NV 89102  
(702) 870-8700  
(702) 870-0034 Fax  
[mgliner@glinerlaw.com](mailto:mgliner@glinerlaw.com)  
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DONNA M. FLOWERS

Plaintiff,

vs.

DISCOVER BANK

Defendant.

No. 2:20-cv-02152-RFB-VCF

**STIPULATION TO EXTEND THE DISCOVERY AND  
CASE MANAGEMENT DEADLINES BY 60 DAYS  
[SECOND REQUEST]**

This stipulation is filed pursuant to LR IA 6-1 and LR IA 6-2. It *has* been filed pursuant to local rule 26-3 with regard to the discovery deadline. Local rule 26-3 requires any request to extend a discovery or case management deadline be received no later than twenty-one (21) days prior to the expiration of the subject deadline. The parties are not requesting extensions to the case management deadlines pertaining to amendment of pleadings and designations of experts. On April 27, 2021 this Honorable Court adopted the parties' initial Stipulated Discovery Plan and Scheduling Order which provided for a discovery deadline of October 12, 2021 [#21]. On August 13, 2021 this Honorable Court approved the parties Stipulation extending the discovery deadline through January 12, 2022 [#32].

1 The parties are discussing settlement and there is a possibility this action can be  
2 concluded without first engaging in costly time consuming Depositions. Plaintiff has served  
3 both initial written discovery and initial disclosures.

4  
5 Accordingly, the parties request adoption of the following deadlines:

- 6 1. Last date to complete discovery: March 14, 2022  
7 2. Last date to file dispositive Motions: April 12, 2022  
8 3. Last date to file Joint Pretrial Order: May 12, 2022 or thirty (30) days after  
9 decision deciding dispositive motion.

10 DATED: November 8, 2021

11 MITCHELL D. GLINER, ESQ.

BALLARD SPAHR LLP

12  
13 /s/ Mitchell Gliner

MITCHELL D. GLINER, ESQ.

14 Nevada Bar No. 3419

15 3017 W. Charleston Blvd. # 95

Las Vegas, Nevada 89102

16 Attorney for Plaintiff

/s/ Joel Tasca

JOEL E. TASCA, ESQ.

Nevada Bar No. 14124

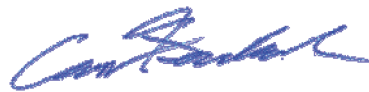
BALLARD SPAHR LLP

1980 Festival Plaza Drive., #900

Las Vegas, Nevada 89135

Attorneys for Defendant

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18  
19 IT IS SO ORDERED:

20 

21 UNITED STATES MAGISTRATE JUDGE

22 DATED: \_ November 10, 2021 \_